

but cannot file responsive pleadings by the due date of October 9, 2019;

3. For several reasons, some of which are due to the facts of this case, obtaining documents and local counsel is commencing a trial on October 7, 2019, Defendants' counsel requires additional time to prepare these responsive documents;
4. Counsel has contacted the Plaintiff's counsel in good faith in order to consent to extend the time for filing the responsive pleading on or about October 7, 2019 via e-mail, and Plaintiff's counsel consented up to October 21, 2019 via e-mail on October 8, 2019. Defendants' counsel requested at least to October 31, 2019 via e-mail;
5. This motion is not being made for the purpose of delay, but is made based upon the counsel's current court schedule and the need for additional time to prepare response papers;
6. This request for an extension of time will in no way result in prejudice to the Plaintiffs.

THEREFORE, Defendants ANTONIO L. GUTIERREZ and PAUL GUTIERREZ respectfully request that they be allowed until October 31, 2019 to file their memoranda in response to the plaintiff's motion for summary judgment.

Dated: October 9, 2019

Respectfully Submitted:

Borce Martinoski, LLC

By: /s/ **Borce Martinoski**
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